Remarks/Arguments

Claims 1-17 have been rejected under 35 U.S.C. 103(a) as unpatentable over U.S. Patent Publication No. 2002/0085516 to Bridgelall, in view of U.S. Patent Publication 2004/0037242 to Shi et al. The Applicants respectfully request the Examiner to reconsider the rejection.

This invention relates to a method for registering a wireless local area network (WLAN) as a cellular network routing area to provide interworking, and to a system for employing a wireless local area network as a cellular network routing area. The cited application of Bridgelall teaches a portable dual mode radio (242) which can roam from a cellular network to a WLAN. However, as the Examiner has pointed out, the reference fails to teach a method wherein, if at or near a WLAN access point, the packet data protocol is maintained while servicing the request using the WLAN. The Examiner has asserted that the publication of Shi et al. maintains packet data protocol while servicing a request using the WLAN. The Applicants can not agree.

Shi et al. relates to a method of allocating an address in a communication system that links a wireless system to a fixed system. Nowhere does Shi et al. show or suggest "maintaining packet data protocol (PDP) context while servicing the request using the WLAN, such that interworking between the WLAN and the cellular network is provided", as specifically recited in Claim 1. Shi et al do not destroy the PDP context table. However, neither do they maintain it. They merely use it. That is, Shi et al makes a request for an address and receives a response to that request. Further, Shi et al. do not contemplate any interworking between a WLAN and a cellular network, as specifically recited in Claim 1. It is therefore clear that, even if the teachings of Shi et al. were to be used in the apparatus shown by Bridgelall, the instant invention would not be obtained.

Claims 2-10 are dependent from Claim 1, and add further advantageous features. The Applicants submit that Claims 2-10 are patentable as their parent Claim 1.

Claim 11 is directed to a system for employing a wireless local area network (WLAN) as a cellular network routing area in which a communication request can be serviced through a WLAN, in which means maintain "packet data protocol context (PDP) while servicing the request using the WLAN to provide smooth hand-off between the WLAN and the cellular network. The Examiner has pointed out that Bridgelall fails to teach maintaining packet data protocol when using a WLAN. The Examiner has asserted that Shi et al. teaches a method of allocating addresses to mobile stations wherein, if at or

near a WLAN access point, the packet data protocol is maintained while servicing the request using the WLAN. The Applicants can not agree.

Shi et al. does not teach or suggest any cellular network which determines if a request can be serviced through a WLAN. Rather, Shi et al. teaches only a request response between networks. It is therefore clear that even if the teachings of Shi et al. were to be used with the apparatus of Bridgelall, the combination would not teach or suggest a cellular network "which determines if the request can be serviced through a WLAN", and "means for maintaining packet data protocol context while servicing the request using the WLAN to provide smooth hand-off between the WLAN and the cellular network", as specifically recited in Claim 11. It is therefore clear that the patentability of Claim 11 is not affected by the two cited references.
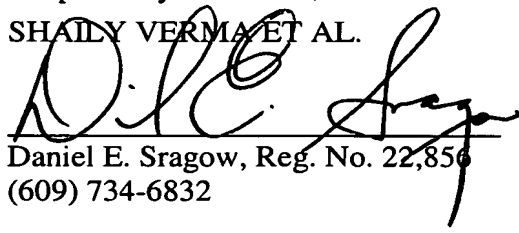
Claims 12-18 are dependent from Claim 11 and add further advantageous features. The Applicants submit that Claims 12-18 are patentable as their parent Claim 11.

The Applicants have reviewed the cited references to Sundar et al., Soderbacka et al., and Boudreaux et al., and believe that these references are no more pertinent to the instant invention than the references which have been applied by the Examiner.

The Applicants have attached a request for correction of the assignment due to an error by the Office.

The Applicants believe that the instant application is in condition for allowance. A notice to that effect is respectfully solicited.

Respectfully submitted,

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